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Attorneys for the Ad Hoc Committee of Trade Claimants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST BY AD HOC TRADE
COMMITTEE FOR SERVICE OF ALL PAPERS AND NOTICES**

PLEASE TAKE NOTICE that, pursuant to § 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Orrick, Herrington & Sutcliffe LLP (“Orrick”) hereby enters its appearance as counsel for the Ad Hoc Committee of Trade Claimants (the “Ad Hoc Trade Committee”) in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002 and 9007, on behalf of the Ad Hoc Trade Committee, Orrick requests that all notices given or required to be given and all papers served or required to be served in these cases be given to or served upon:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code § 1109(b) and Bankruptcy Rules 2002 and 9007, the foregoing request includes, in addition to the notices and papers referred to in such Bankruptcy Rules, all orders and notices of any hearing, motion, application, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether sent by mail, hand delivery, telephone, facsimile or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request by the Ad Hoc Trade Committee for Service of All Papers and Notices shall not be deemed or construed to be a waiver of the rights of the Ad Hoc Trade Committee to (i) have final orders in non-core matters entered only after *de novo* review by a United States District Judge, (2) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request by the Ad Hoc Trade Committee for Service of All Papers and Notices is without prejudice to: (1) any rights, remedies, claims, actions, defenses, setoffs, or recoupments, to which the Ad Hoc Trade Committee or any of its individual members is or may be entitled to, in law or in equity, against the Debtors and any other entities either in these cases or in any other action, all of which rights,

remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved; and (2) any objection which may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit the Ad Hoc Trade Committee or any of its members to the jurisdiction of the Court.

Dated: New York, New York
May 5, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: _____/s/
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Attorneys for the Ad Hoc Committee of Trade
Claimants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of May 2006, I caused a true and correct copy of the foregoing Statement of Representation by Orrick, Herrington & Sutcliffe LLP of More Than One Creditor Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure to be served via first class mail, postage prepaid, on the following:

John William Butler, Jr., Esq. Counsel to the Debtors
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/s/

Alyssa Englund, Esq.